



William Cafaro, Esq.
ADMITTED IN NY, CA, MD & TX
Email: bcafaroe@cafaroesq.com

Amit Kumar, Esq.
Managing Attorney
ADMITTED IN NY & NJ
Email: akumar@cafaroesq.com

108 West 39th Street, Suite 602
New York, New York 10018
Telephone: 212.583.7400
Facsimile: 212.583.7401
www.cafaroesq.com

Louis M. Leon, Esq.
Associate
ADMITTED IN NY
Email: lleon@cafaroesq.com

Andrew S. Buzin, Esq.
Of Counsel
ADMITTED IN NY, FL & DC

February 14, 2019

Via ECF

Hon. Vernon S. Broderick, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square, Courtroom 51B
New York, NY 10007-1312

Re: Ovalles Acosta v. Prudent Management, LLC
Case No.: 17-cv-07590 (VSB)

Your Honor:

This office represents the Plaintiff in the above referenced FLSA and NYLL action. We write, jointly with the Defendants, in compliance with paragraph 11 of the Case Management Plan and Scheduling Order (D.E. 16) and to request an adjournment of the post discovery conference currently scheduled for February 28, 2019. On February 8, 2019, the Honorable Debra Freeman granted in part the Parties' request to complete depositions in this action. (D.E. 52) Specifically, Judge Freeman ordered the parties to complete depositions by the end of this month and to complete any follow-up discovery on or before March 15, 2019. *Id.* To date the parties have complied with the Magistrate Judge's directive concerning depositions in this Action.

Regarding the post discovery conference currently schedule for February 28, 2019, the Parties respectfully request that this conference be adjourned until sometime in April. This will allow the parties to assess the discovery and fully comply with paragraph 11 of the Case Management Plan and Scheduling Order (D.E. 16). This is the Parties third request for an adjournment of this conference. The first two requests for an adjournment of this conference were granted by the Court.

We thank the Court for its courtesy in this regard.

Respectfully submitted,
LAW OFFICES OF WILLIAM CAFARO

A handwritten signature in blue ink, appearing to read 'W. Cafaro', is written over a horizontal line.

By Amit Kumar (AK 0822)
Attorneys for Plaintiff
108 West 39th Street, Suite 602
New York, New York 10018
(212) 583-7400
AKumar@CafaoroEsq.Com

CC:
All Defense counsel (via ECF)